

5929 Balcones Drive, Suite 200 Austin, TX 78731

T [512]343-2544 F [512]343-0119

February 26, 2015

VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, DC 20554

EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

being filed pursuant to Commission Rule 64.2009(e). please find the attached annual CPNI certification and accompanying statement which is On behalf of AMA TechTel Communications, L.L.C. dba AMA TechTel Communications,

652-7726. Should you have any questions or need further information, please contact me at (512)

Sincerely,

Dorothy Young

Authorized Representative of AMA TechTel Communications

DY/pjf

Attachment

cc: Mr. Dell Purdy, AMA TechTel Communications



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2014

Date filed: February 26, 2015

Name of company covered by this certification: AMA Communications L.L.C. dba AMA TechTel

Communications

Form 499 Filer ID: 822868

Name of signatory: Dell Purdy

Title of signatory: VP Regulatory Compliance

are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq. the company, that I have personal knowledge that the company has established operating procedures that I, Dell Purdy, certify that I am an officer of the company named above, and acting as an agent of

procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. Attached to this certification is an accompanying statement explaining how the company's

either state commissions, the court system, or at the Commission against data brokers) against data processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect brokers in the past year. Companies must report on any information that they have with respect to the The company has not taken any actions (proceedings instituted or petitions filed by a company at

to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of release of CPNI (number of customer complaints a company has received related to unauthorized access the information, or instances of improper access to online information by individuals not authorized to improper access by employees, instances of improper disclosure to individuals not authorized to receive The company has not received any customer complaints in the past year concerning the unauthorized view the information).

Signed Du Purh

Attachment: Accompanying Statement explaining CPNI procedures

AMA Communications L.L.C. dba AMA TechTel Communications 499 Filer ID 822868

7201 I-40 West, Suite 200 Amarillo, TX 79106 Phone: (806) 722-2247

2014 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE

64, Subpart U of the FCC's rules. See 47 C.F.R. § 64.2001 et seq. Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part This statement accompanies the Company's 2014 Customer Proprietary Network Information ("CPNI")

otherwise All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated

any disaggregation or refinement based on CPNI purposes, the Company uses customer billing name and address and/or telephone number without of this date, the Company has not used nor plans ð use CPNI for marketing. For marketing

1. Identification of CPNI

The Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Company has established procedures and trained employees having access to, or occasion to use

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different telecommunications and non-telecommunications services that affect how the Company uses CPNI. types of

ယ Identification of Permissible Uses of CPNI without Customer Authorization

to identify uses of CPNI not requiring customer authorization under Section 64.2005 The Company has established procedures and trained employees having access to, or occasion to use CPNI,

Identification of Uses of CPNI Requiring Customer Authorization

to identify uses of CPNI requiring customer authorization under Section 64.2007. The Company has established procedures and trained employees having access to, or occasion to use CPNI,

Customer Notification and Authorization Process

initiation of any program for use of CPNI for marketing, the Company will train employees with a need and/or responsibility for obtaining customer authorization to use CPNI for marketing purposes, regarding the The Company does not use CPNI for marketing and thus, at this time, has not provided notice regarding Optnotice and approval requirements under Section 64.2008 Prior to any planned use of CPNI for marketing, the Company will initiate the notification and Opt-Out The Company has trained employees regarding prohibitions on use of CPNI for marketing. The Company does not provide CPNI to other parties and thus has not used the opt-in approval

6. Record of Customer CPNI Approval/Non-Approval

At such time as the Company may initiate use of CPNI for marketing with corresponding launch of a notification and Opt-Out process, the Company will develop and utilize a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a).

7. Procedures Protecting Against Disclosure of CPNI

64.2010 including, but not limited to the following: The Company has implemented procedures or confirmed existing procedures for compliance with new Section

- office visits. Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business
- The Company provides customers with on-line access to customer account information controlled by password
- changes, The Company has implemented procedures to methods due to forgotten passwords. including changes in address-of-record and attempts at access to CPNI through use of back-up provide immediate notification to customers <u></u> account

∞ Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

- No actions taken against data-brokers.
- No customer complaints received.

9. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

10. Supervisory Review Process for Outbound Marketing

Before undertaking to use CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules.

Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.